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Counsel for Defendant Absolute Dental Group, LLC

[Plaintiffs' counsel listed below]

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

KATHLEEN JORDAN et al., individually
and on behalf of all others similarly situated,

Plaintiffs,

v.

ABSOLUTE DENTAL GROUP, LLC and
JUDGE CONSULTING, INC.

Defendants.

Case No. 2:25-cv-00986-JAD-DJA

**JOINT MOTION
~~STIPULATION AND [PROPOSED]~~
ORDER EXTENDING TIME FOR
DEFENDANT ABSOLUTE DENTAL,
LLC TO RESPOND TO THE SECOND
AMENDED COMPLAINT
(FIRST REQUEST)**

IT IS HEREBY STIPULATED AND AGREED between Plaintiffs Kathleen Jordan, Marlo Eastman, Edwina Jackson, Amanda Maduiké-Iwata, and Viridiana Tinajero Monterroza (collectively, "Plaintiffs") and Defendant Absolute Dental Group, LLC ("Absolute Dental," and together with Plaintiffs, the "Stipulating Parties"), by and through their undersigned counsel, that Absolute Dental's deadline to answer or otherwise respond to the Second Amended Complaint (ECF No. 48) shall be extended by 30 days, to October 31, 2025. In support of their stipulation, the Stipulating Parties state as follows:

1 1. On June 4, 2025, Plaintiff Jordan filed the initial Complaint in this action, raising claims
2 arising out of an alleged data security incident that potentially impacted certain information pertaining to
3 Absolute Dental's patients (the "Data Security Incident"). *See* ECF No. 1.

4 2. On June 25, 2025, Plaintiff Jordan filed the First Amended Complaint ("FAC"), adding
5 Plaintiffs Eastman, Jackson, Maduiké-Iwata, and Tinajero Monterroza as plaintiffs in this action. *See*
6 ECF No. 9.

7 3. On September 2, 2025, Plaintiffs filed an unopposed motion for leave to file a Second
8 Amended Complaint ("SAC"). ECF No. 40.

9 4. On September 17, 2025, the Court granted Plaintiffs' motion for leave to file the SAC,
10 and Plaintiffs filed the SAC later that day. ECF Nos. 47, 48. Accordingly, Absolute Dental's current
11 deadline to answer or otherwise respond to the SAC is October 1, 2025. *See* Fed. R. Civ. P. 15(a)(3).

12 5. The SAC names an additional Defendant, Judge Consulting, Inc. ("Judge"). *See* ECF No.
13 48. On September 18, 2024, Judge executed a waiver of service. *See* ECF No. 50. Accordingly, Judge's
14 deadline to answer or otherwise respond to the SAC is November 17, 2025. *Id.*

15 6. On September 22, 2025, the Court appointed certain of undersigned Plaintiffs' counsel as
16 Interim Co-Lead Class Counsel. *See* ECF No. 49.

17 7. The Court may extend Absolute Dental's response deadline "for good cause . . . if [the]
18 request is made before the original time . . . expires[.]" Fed R. Civ. P. 6(b)(1)(A).

19 8. The Stipulating Parties respectfully request that the Court extend Absolute Dental's
20 deadline to answer or otherwise respond to the Complaint to October 31, 2025.

21 9. Good cause exists for the requested 30-day extension. To begin, the SAC adds many new
22 paragraphs of allegations against Absolute Dental, including allegations stemming from the recent
23 issuance of notice to individuals potentially impacted by the Data Security Incident. Further, the SAC
24 adds an additional Defendant and includes allegations regarding Absolute Dental's connection to the new
25 Defendant. Absolute Dental requires additional time to evaluate the SAC's new allegations and prepare
26 an appropriate response.

27 10. In addition, a 30-day extension would place Absolute Dental's responsive pleading
28 deadline beyond the date of the Stipulating Parties' forthcoming mediation. Specifically, the Stipulating

Parties have scheduled a mediation session on October 29, 2025, with mediator Bennett G. Picker, Esq., at which the putative class will be represented by Interim Co-Lead Class Counsel. The Stipulating Parties wish to focus their time and effort over the next month preparing for the mediation rather than briefing a motion to dismiss—a motion which would become moot if the mediation is successful.

11. This is the first extension requested by any Party in this matter in connection with the SAC. This request is not made to delay proceedings or for any other improper purpose, and neither the parties nor the Court will be prejudiced by the requested extension.

12. Accordingly, the Stipulating Parties stipulate to and respectfully request that the Court extend Absolute Dental's deadline to respond to the SAC by 30 days, to October 31, 2025.

IT IS SO STIPULATED.

DATED this 24th day of September

/s/ Philip R. Erwin

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DATED this 24th day of September

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ORDER

Under Local Rule 7-1(c), a stipulation that has been signed by fewer than all the parties or their attorneys will be treated - and must be filed - as a joint motion. The Court thus treats this filing as a joint motion and will expect that future filings follow Local Rule 7-1(c). The Court GRANTS the joint motion (ECF No. 51).

DATED: 9/26/2025



 DANIEL J. ALBREGTS
 UNITED STATES MAGISTRATE JUDGE

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that the foregoing **STIPULATION AND [PROPOSED] ORDER EXTENDING TIME FOR DEFENDANT ABSOLUTE DENTAL, LLC TO RESPOND TO THE SECOND AMENDED COMPLAINT** was served on September 24, 2025, via the Court's CM/ECF electronic filing system addressed to all parties on the e-service list.

/s/ Philip R. Erwin
PHILIP R. ERWIN

Counsel for Defendant Absolute Dental Group, LLC